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April 26, 2002

Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12<sup>th</sup> St., SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Contact:

Second Joint Application of BellSouth For Authorization Under Section 271 Of The Communications Act To Provide In-Region, InterLATA Service In The States Of Georgia and Louisiana, CC Docket No. 02-35

Dear Ms. Dortch:

On Tuesday April 23, 2002, Joan Marsh, Richard Rocchini, David Eppsteiner and I met with Jordan Goldstein, Commissioner Copps' Legal Adviser, regarding the above referenced proceedings. In that meeting, we reiterated AT&T's opposition to BellSouth's application for all of the reasons articulated by AT&T in its Comments, Reply Comments and ex parte filings in this docket.

In addition, pursuant to Mr. Goldstein's request, attached please find a summary of the 74 open exceptions and observations in the on-going Florida OSS test being conducted by KPMG. The summary identifies the three exceptions (88, 123 and 155) and one observation (124) open regarding the BellSouth Change Control Process. Exception 88 deals with the core issues of prioritization, sequencing, resource allocation and implementation of change requests. The revisions AT&T has identified in our April 19, 2002 ex parte letter that map to this exception include the need for a specific implementation timetable, the need for a single prioritization process, the need for accurate and complete information regarding release capacity and timing and the need to implement the current backlog. Exception 123 deals with the improper handling

of defects by BellSouth. Exception 155 and Observation 124 focus on BellSouth's failure to comply with portions of the CCP.

Finally, in response to your inquiry, the discussion of significant change requests contained in the current backlog can be found in the Supplemental Declaration filed by AT&T witnesses Bradbury and Norris at paragraph 149.

The positions expressed by AT&T during the meeting were consistent with those contained in the Comments and ex parte filings previously made in each of these dockets. One electronic copy of this Notice is being submitted in accordance with the Commission's rules.

Sincerely,

Robert W. Zummy

cc: Jordan Goldstein

	Observations	Exceptions	Total
Order Management	7		
Order Management			
Functional Testing	8	8	16
Volume Testing	3	2	5
Flow-through	1	4	5
Process testing	1		1
Order Management Total	13	14	27
Provisioning	2	7	9
Repair	1		1
Relationship Mgmt.			
		-	
Change Management	1	3	4
Account Team	2		2
Interface Development	2	2	4
Relationship Mgmt. Total	5	5	10
Billing	1	5	6
Performance Measures			
Definitions and Standards	2		2
Change Management		1	1
Data Integrity		7	7
Calculation Verification	4	7	11
Performance Measures Total	6	15	21
Total Open Observations and Exceptions	28	46	74

# ORDER MANAGEMENT

E/O	Test #	Description
		PRE-ORDERING/ORDERING FUNCTIONAL TEST
E-16	TVV-1 (3/5/01)	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE
	TTT 1 (2 (4 2 (0 1)	loops.
	,	BST does not provide time stamps for LSRs for clarifications and completion notices via LENS.
E-49	TVV1 (4/24/01)	The BellSouth Business Rules for Local Ordering-OSS 9 does
		not define a process for an unbundled loop (REQTYP A)
100		service migration (ACT V) request from one CLEC to another CLEC.
E-75	TVV1 (6/28/01)	BST's error responses are inconsistent with the BellSouth
		business rules for local ordering OSS 99 for conversions of
		retail, resale, and UNE-P accounts to line-sharing accounts
O-87	TVV1 (6/29/01)	The LENS interface does not support orders requesting to
		move a CLEC account outside of the end user's location.
E-87	TVV1 (7/16/01)	BST's TAG interface experiences various backend resource
		limitation exceptions that affect the transmission of local
		service requests and pre-order queries.
E-90	TVV1 (7/20/01)	KPMG did not receive timely non-mechanized FOCs from
		BellSouth via fax and electronic mail.
0-127	TVV-1 (10/15-	BST does not provide complete FOC or CN responses to to
	01)	xDSL service requests submitted through LENS.
E-117	TVV-1	KPMG has not received manual FOCs on service that have
, ,	(11/01/01)	been assigned a completed status in BellSouth's Customer
***		Service Order Tracking System (CSOTS)
E-129	TVV-1	KPMG has not received timely partially mechanized FOCs
	(01/03/02)	from LENS.
E-131	TVV1 (01/03/02)	KPMG has not received timely partially mechanized FOCS
		from EDI.
1 '	TVV1 (02/13/02)	KPMG has not received timely partially mechanized rejects
163		via EDI.
O-	TVV1 (02/13/02)	BST's ordering documents provide inadequate instructions on
164		how to submit orders for Centrex.
0-	TVV1 (03/04/02)	BellSouth is providing an error response to UNE-P service
172		requests submitted via LENS that is inconsistent with the BBRLO.
O-	TVV1 (03/18/02	KPMG has not received timely address validation query pre-
173	(12.22.22	orders submitted with TAG.
0-	TVV1 (4/19/02)	BST provides inconsistent information on FOC responses for
183		resale and UNE-P service requests submitted via TAG and
	E-16  O-49  E-49  E-75  O-87  E-87  E-90  O-127  E-117  E-129  E-131  O- 163  O- 164  O- 172  O- 173  O-	E-16 TVV-1 (3/5/01)  O-49 TVV-1 (3/13/01)  E-49 TVV1 (4/24/01)  E-75 TVV1 (6/28/01)  E-87 TVV1 (7/16/01)  E-90 TVV1 (7/20/01)  O-127 TVV-1 (10/15-01)  E-117 TVV-1 (11/01/01)  E-129 TVV-1 (01/03/02)  E-131 TVV1 (01/03/02)  O- TVV1 (02/13/02)  163  O- TVV1 (03/18/02)  172  O- TVV1 (03/18/02)  O- TVV1 (03/18/02)  O- TVV1 (4/19/02)

			EDI.
			VOLUME TEST
1	E-116	TVV2 (11/01/01)	BST representatives did not provide expected responses to
			Local Service Requests submitted by KPMG via fax.
2	O-	TVV2 (11/07/01)	KPMG has not received timely responses for pre-order queries
	135		submitted via LENs.
3	E-160	TVV2 (04/1/02)	KPMG has experienced system degradation while processing
			Local Service Requests via the LENS interface.
4	O-	TVV2 (04/23/02)	BST systems provide inaccurate auto clarifications for LSRs
	187		submitted via the LENS interface.
5	O-	TVV2 (04/23/02)	KPMG has not received fully mechanized responses for LSRs
	188		submitted via EDI and TAG interfaces.
			FLOW-THROUGH
1	E-86	TVV-3 (7/16/01)	KPMG did not receive flow-through FOCs on LSRs submitted
			electronically via the mechanized ordering process.
2	E-121	TVV3 (11/13/01)	KPMG could not identify flow-through FOCs on LNP Service
			Requests submitted electronically via the mechanized ordering process.
3	E-122	TVV3 (11/13/01)	BST did not provide flow-through classification information
			for DSL orders submitted by KPMG.
4	E-136	TVV3 (01/15/02)	KPMG did not receive flow-through FOCs on UNEs submitted
		. · · · · · · · · · · · · · · · · · · ·	electronically via the mechanized ordering process.
5	О-	TVV3 (02/22/02)	BST's flow-through documentation contains incomplete and
	167		inconsistent information regarding product flow-through
			capabilities of BST's OSS.
			PRE-ORDERING/ORDERING PROCESS TESTS
1	E-110	PPR8 (10/03/01)	BellSouth does not have adequate guidelines for call tracking
			and resolution at the LCSC.

# PROVISIONING, REPAIR AND MAINTENANCE

O-82		PROVISIONING	
O-82		FAUVIDIUMING	
	TVV4 (6/13/01)	BellSouth's systems or representatives did not update Customer Service Records consistently following a change in the status of a customer's account.	
E-76	TVV4 (6/28/01)	BellSouth failed to provision disconnect orders properly with the expected intercept recording message.	
E-84	TVV4 (7/10/01)	BST failed to use the proper codes when provisioning switch translations.	
O- 106	TVV4 (8/14/01)	BST's systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG.	
E-112		BellSouth's systems or representatives have not consistently provisioned service and features as specified in orders submitted by KPMG.	
E-156	TVV4 (12/12/01)	BellSouth failed to use the proper codes when provisioning OS/DA. (Previously observation O-152)	
E-130	TVV4 (01/03/02)	BellSouth's systems or representatives did not consistently provision service in a timely manner for orders submitted by KPMG Consulting.	
E-139	TVV4 (01/24/02)	BST's line loss report does not provide enough detail for CLECs to properly identify account activity.	
E-158	TVV4 (03/04/02)	BellSouth's CLEC Line Loss Report does not update in a timely manner.	
		REPAIR	
O- 159	PPR14 (1/30/02)	KPMG has found that call receipt personnel within the residence repair center in Jax. Fl do not adhere to BST procedures outlining customer requests for earlier appointments.	
	E-84 O- 106 E-112 E-156 E-130 E-139 E-158 O-	E-84 TVV4 (7/10/01)  O- TVV4 (8/14/01)  106  E-112 TVV4 (10/01/01)  E-156 TVV4 (12/12/01)  E-130 TVV4 (01/03/02)  E-139 TVV4 (01/24/02)  E-158 TVV4 (03/04/02)  O- PPR14 (1/30/02)	

# RELATIONSHIP MANAGEMENT

	E/O	Test #	Description
			CHANGE MANAGEMENT
1	E-88	PPR1 (07/20/01)	BST Change Control Process does not allow CLECs to
			prioritize all Change Requests that affect CLEC business.
2	O-	PPR-1 (10/12/01)	BST failed to follow the documentation defect procedures as
	124		detailed in the BST change control process document.
3	E-123	PPR-1 (12/05/01)	BellSouth is not classifying change requests as defects in
			accordance with the BellSouth definition of a defect.
4	E-155	PPR-1 (12/19/01)	BellSouth did not publish the business rules associated with
			Minor Release 10.3 as defined in the Change Control Process.
			(Previously Observation 154)
			ACCOUNT TEAM
1	O-	PPR-2 (02/13/02)	BST User Guides have inaccurate account team references.
	166		
2	O-	PPR-2 (03/04/02)	BellSouth's External Response Team Account Management
i	170		Sub-Process for responding to written CLEC correspondence
			is not documented.
			INTERFACE DEVELOPMENT
1	O-	PPR-5 (12/05/01)	BellSouth does not apply system fixes to defects to all
1 2 2	148		production versions of the OSS interfaces.
2	E-128	PPR-5 (12/20/01)	BellSouth does not support pre-order testing in CAVE.
3	E-157	PPR-5 (03/04/02)	BellSouth fails to follow its software testing and quality
			processes.
4	O-	PPR-5 (4/12/02)	BST does not follow the documented process for extending a
	182		test agreement with a CLEC.

# BILLING

	E/O	Test #	Description	
1	E-96	TVV11 (8/08/01)	BST delivered resale bills reflecting incorrect usage charges	
2	E-44	TVV11 (4/4/01)	BST issued CABs bills that reflect incorrect quantities of	
		*	switching and transport usage.	
3	E-62	TVV11 (5/23/01)	BellSouth bills reflect a rate for a Service Order mechanized	
			Charge that is inconsistent with the rate contained in the ICA	
			agreement between BST and KPMG CLEC.	
4	E-138	TVV11 (1/24/02)	UNE invoices received from BST fail to reflect credits	
			associated with reduced rates from the amendments to ICA	
			agreement with KPMG CLEC.	
5	E-159	TVV10 (3/11/02)	BST failed to deliver at least 95% of Daily Usage File records	
<u></u>			within six calendar days following date calls were placed.	
6	O-	TVV11	BST's published business rules for calculating fractional	
	181	(04/08/02)	charges does not yield correct results.	

# PERFORMANCE MEASURES

	E/O	Test #	Description	
			DEFINITIONS AND STANDARDS	
1	O-178	PMR-2	KPMG has found that BST's method of sampling records used	
		(04/01/02)	for the calculation of Service Order Accuracy may produce	
			biased estimates.	
2	O-180	PMR-2	KPMG has found that BST's method of sampling records used	
		(04/05/02)	in the calculation of the % Database Update Accuracy may	
			produce inaccurate results.	
			METRICS CHANGE MANAGEMENT	
1	E-119	PMR-3	KPMG has discovered that BST is not adhering to the	
		(11/12/01)	documented metrics change control process for tracking	
			changes in TeamConnection.	
			DATA INTEGRITY	
1	E-36	PMR4 (3/21/01)	BST does not properly construct the processed data used to	
			validate FOC and rejection timeliness (former observation-6).	
2	E-113	PMR-4 (10/4/01)	KPMG has found that BST does not capture xDSL	
	T 114	D) (D) 4 (10/5/01)	transactions in flow-through measure.	
3	E-114	PMR-4 (10/5/01)	BellSouth incorrectly excludes data between the BARNEY	
			Snapshot database and NODS stages of the PMAP process for FOCs for June 2001 data.	
4	E-120	PMR-4	BellSouth incorrectly excludes data between the BARNEY	
4	E-120	(11/13/01)	Snapshot database and NODS stages of the PMAP process for	
		(11/13/01)	fully and partially mechanized orders for the % rejected	
			service requests (non-trunks).	
5	E-143	PMR-4	BST incorrectly excludes data between BARNEY and NODS	
		(02/04/02)	stages of the PMAP process for non-mechanized orders for %	
			rejected service requests non –trunks for June 01 data.	
6	E-144	PMR-4	BST incorrectly excludes data between BARNEY and NODS	
		(02/04/02)	stages of the PMAP process for non-mechanized orders for	
,			reject interval - non -trunks for June 01 data	
7	E-145	PMR-4	BST incorrectly excludes data between BARNEY and NODS	
		(02/04/02)	stages of the PMAP process for non-mechanized orders for	
			FOC Timeliness - non -trunks for June 01 data	
			FOC Timeliness - non –trunks for June 01 data	

				METRICS CALCULATION/REPLICATION
1		E-10	PMR-5 (12/4/00)	KPMG has found that BST's metrics calculations for LNP
			·	reject intervals are inconsistent with the documented metrics
				calculations (formerly observation 12).
2		E-101	PMR-5 (8/24 01)	KPMG cannot replicate the values in:
				the Total Service Order Cycle Time report for January 2001.
3		E-153	PMR-5 (8/29/01)	KPMG cannot replicate the values in:
				the Provisioning LNP Total Service Order Cycle Time
		:		measurement report. (Previously observation 113)
4	.,	E-152	PMR5	KPMG cannot replicate the values in the LNP Missed
1.			(10/17/01)	Appointments Measure. (Previously Observation 125)
5	· · · · · · · · · · · · · · · · · · ·	E-151	PMR-5	KPMG cannot replicate the values in the #
		n e e	(11/13/01)	completions/attempts without notice or with less than 24 hours
				notice measure. RDUM instructions are not sufficient.
6		E-124	PMR-5	KPMG cannot replicate the values in the flow through report
			(12/05/01)	for November 2000.
7		E-135	PMR-5	KPMG cannot replicate the values in the Jeopardy Notice
			(01/08/02)	Interval.
8		O-176	PMR 5	KPMG cannot replicate the values in the Average Completion
			(03/19/02)	Notice Interval.
9		O-179	PMR-5	KPMG cannot replicate the values in the LNP % rejected
			(04/01/02)	service requests metric.
10	)	O-185	PMR-5	KPMG cannot replicate the values in the Hot Cut Timeliness
			(04/23/02)	% within interval and average interval
1	<u> </u>	O-186	PMR-5	KPMG has not received timely UNE loop completion notices
			(04/23/02)	submitted via the TAG interface.